



.au Policy Review Panel
PO Box 18315
Melbourne VIC 3001
Australia

2 March, 2018

To Whom It May Concern

According to request for feedback on the .au Policy Review Panel I am writing this letter to express my strong views **against** not only the implementation of direct registration, but also the process in which it is being suggested for implementation.

As a small business based in Australia, we cannot see first of all the demand for direct registration, let alone how it will add any value to the existing space. We strongly believe that it will sharply devalue existing domain names, confuse consumers and cost registrants twice the amount per year as they will be simply registering their name for defensive purposes. We we're questioned about our argument on defensive acquisitions as it relates to .net.au to which we replied that it is generally accepted that a .net.au is the far less premium brand when compared to .com.au. The fact that direct registration is already being labelled as a 'more catchy' alternative to consumers means that it poses a huge threat to existing brands.

I think the decision on Direct Registration is irresponsible at best. As a requirement of owning a .com.au domain name, the user must submit an email address. We are wondering why each person who owns a .com.au domain name wasn't sent an email regarding this decision. We we're told at the forum that 'some of the resellers sent them out'. This argument is simply not good enough. If AUDA has access to every email address for every owner of a .com.au domain name, the responsible thing to do would be to email everyone and request public opinion. My strong opinion on this matter is that it should be **reversed** until such time as the public is made adequately aware of this change. Each and every .com.au owner that I speak to who is not actively involved in the industry has no

idea that this is happening and the effect that it may have on their business. In fact, every time that I mention it they are shocked and immediately worried. This needs to be rectified as a matter of urgency before it is too late.

This objection will follow the same format in which the Questions are outlined on page 5 of the Issues Paper provided at the public forum in Brisbane

.au Structure

1. I believe that there is no harm in allowing the .au namespace to be 'general purpose' domain for all Australians. I believe that every Australian should have the right to own a domain name
2. My views on this are that if it is not broken, don't fix it. I don't believe there is a demand to close the .net.au registrations. And this would simply be a complete mess trying to implement and grandfather in existing owners. Ie what happens if they build a great brand on this extension and then forget to renew it in 5 years. Can they get it back etc?
3. I do not have views that I wish to express on the .asn namespace
4. I do not have views that I wish to express on the State and territory namespaces

Reserved Names

5. I do not have views that I wish to express on this
6. I believe that this needs to be matter of public opinion. For every name or batch of names that needs to be reserved, it should be published on the AUDA website for review and consultation.
7. I do not have views that I wish to express on this
8. Yes. Again these names need to be made public.

Eligibility and allocation rules

9. Again, if it is not broken don't fix it. This would be an absolute disaster if implemented and would cost the Australian public millions or potentially billions of dollars. Ie if Timmy the Plumber wanted to make a website online about selling cat products, why should we restrict him from doing so? Why should we make him spend hundreds of dollars more per year on registering an exact match company, pay additional company costs etc. We are a nation who should be encouraging entrepreneurship, not restricting it. What about

those who own a number of brands or domain names online that they intend to build? These are people who have followed the rules put in place by AUDA and now because of a change of heart their business essentially disintegrates overnight? Who is going to pay the tens, hundreds or thousands of new company registration costs involved in setting up new companies and completing the yearly documents involved in running a company. My answer to this is absolutely do not restrict registrants to an exact match eligibility.

10. See above. If this must be implemented it must not be restricted to those with an exact match company. What about those who have a name ie Sumo.com.au, and don't own the exact match company? (this may or may not be true for Sumo, this is an example)
11. Again, I believe this will cause confusion for the customers. What about Café.com.au vs Cafe.com.au?

License conditions

1. I do not have views that I wish to express on this
2. Yes
3. This question is far too broad. It needs to be specified. Why would auDA suspend a domain name and under what conditions are you proposing?
4. For the purpose of notifying consumers of MAJOR changes in the industry that may harm or devalue their business ie the implementation of direct registration.
5. Again, if it is not broken don't fix it. It is fine how it is.

Further Comments

1. As stated, we believe that the implementation of direct registration should be reversed until such time as the public is made adequately aware of the change, and the damage it could do to their existing business.
2. The implementation process suggested re a lottery system is one of the most misguided and unreasonable approaches to a domain allocation that we've ever heard of. The fact that someone who owns a .net.au is as eligible as someone who owns a .com.au for direct registration is absurd. The sheer number of registrations of each extension clearly cements our argument, let alone the average resale price of each.
3. In order to be satisfied that this is not a 'money grab', we would request that at very minimum the .au is given directly

to the .com.au owners (like was done in the UK and NZ) for 5 years for free.

4. We believe that the implementation of direct registration will do nothing but HURT existing brands and devalue their assets, for no other reason other than the similarity. If a consumer sees 'RealEstate.com.au' and 'RealEstate.au', it is much more easily confused than 'RealEstate.com.au' and 'RealEstate.net.au'.
5. We are not satisfied that there is a demand for direct registration and cannot find any evidence to support this claim. When asked in the forums we were told that was not a question for them and the decision had already been made. Why was there not a public forum on the decision to implement direct registration in the first place?
6. We do not believe that the implementation of direct registration is in line with the promotion of fair trading. What about those who have paid a lot of money for a premium domain name in the past 2 years and now risk losing the chance to own the .au due to a 'cut off period'?
7. We believe that if direct registration is to be implemented, there should be no cut off period.
8. Who is going to pay for the additional yearly costs to all Australians? And who stands to gain from this yearly costing?
9. Has there been a cost/benefit analysis done by AUDA on this? If not why not? And if so why has it not been made public?
10. Why is there still no peak business body representative with two days left to review?

Suggestion

Our strong suggestion on this topic is to that the implementation of direct registration should be **reversed** until such time as the public is made adequately aware of this change.

If this is to go forward, the .com.au owner should receive first rights to the .au counterpart for 5 years for free.

Yours sincerely



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